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Subject: East Columbia Basin Irrigation District comments to the Department of Ecology (Ecology)  
proposed Washington State Water Quality Assessment for Freshwater 303(d) Listings.

Dear Water Quality assessment team:

Thank you for the opportunity to review and comment on the proposed Water Quality Freshwater Assessment (Assessment) to update the 303(d)-list for Washington State. The East Columbia Basin Irrigation District (East district) requests that Ecology refine their classification protocols to ensure appropriate names and designations are applied to respective water bodies. A clear distinction should be made between irrigation facilities and naturally occurring lakes, rivers, streams or creeks. Under the proposed 303(d) list, some district facilities are incorrectly designated as streams and/or rivers.

It is important that these facilities be appropriately named and designated due to the criteria they are commonly listed for (temperature, pH and dissolved oxygen). East district facilities are man-made and atypical of the naturally occurring water bodies the 303(d) list is intended for. Due to the unnatural nature of these facilities, the aforementioned criteria can rarely be met.

According to the Water Quality Standards, 173-201A-260, *Natural conditions and other water quality criteria and applications* (1) (a and b), "It is recognized that portions of many water bodies cannot meet the assigned criteria due to the natural conditions of the water body. When a water body does not meet its assigned criteria due to natural climatic or landscape attributes, the natural conditions constitute the water quality criteria." "When a water body does not meet its assigned criteria due to human structural changes that cannot be effectively remedied (as determined consistent with the federal regulations at 40 CFS 131.10), then alternative estimates of the attainable water quality conditions, plus any further allowances for human effects specified in this chapter for when natural conditions exceed the criteria, may be used to establish an alternative criteria for the water body (see WAC 173-201A-430 and 173-201A-440)." Due to their unique nature and design, East district facilities should not constitute the same water quality criteria as naturally occurring lakes, rivers, streams or creeks and should be assessed in a way that better represents their natural climatic conditions.

The East District is concerned with the validity of some of the data being used in previous and current 303 (d) listings. It has been brought to our attention that raw Bureau of Reclamation (Bureau) data has been taken from STORET and used in the assessment of East District facilities. This data has not been fully evaluated through a Quality Assurance/Quality Control (QA/QC) plan. The East District request that all Bureau data obtained through STORET resulting in 303(d) listings be removed as it was not obtained following the requirements as stated in the Water Quality Data Act (RCW 90.48.570 through RCW

90.48.590) that states: "Ecology shall use credible data for the following actions-determining whether any water of the state is to be placed on or removed from any section 303(d) list."

The East District appreciates the opportunity to comment on the proposed 303 (d) list. The website improvements and public hearings offered by Ecology were very helpful in utilizing the technical features offered on the website and better understanding the Fresh Water evaluation process.

Sincerely,

Jamie Balliet  
Water Quality Program Manager  
East Columbia Basin Irrigation District